



**CONESTOGA-ROVERS
& ASSOCIATES**

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MEMORANDUM

TO: Ms. Sharon Newlon REF. NO.: 042192-03

FROM: Garth Daley/ko/73 DATE: January 31, 2007

C.C.: RRG/Clayton Site Technical Committee
P. Harvey
R. Shepherd
B. Schloessler
M. Sivek

RE: **Status Report # 15 for the Resource Recovery Group/Clayton Chemical Company Site**

This Status Report is being submitted to the United States Environmental Protection Agency (U.S. EPA) and its designated On-Scene Coordinator (OSC) Kevin Turner in accordance with Section VIII, Condition 19.a. of the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the Resource Recovery Group/Clayton Chemical Soils (RRG/Clayton) Site dated October 28, 2005. The reporting period for this fifteenth Monthly Status Report is December 25, 2006, through January 26, 2007.

EFFECTIVE DATE

On November 1, 2005, Ms. Sharon Newlon, the acting counsel for the RRG/Clayton Site Potentially Responsible Party Group (the Respondents), received the AOC. In accordance with Section XXVIII, Condition 76 of the AOC, this date represented the Effective Date for the AOC and started the compliance time clock for the Removal Action. Status Report # 14 was submitted to U.S. EPA on December 30, 2006.

1.0 COMPLETED ACTIVITIES

1.1 PRE-MOBILIZATION, MOBILIZATION AND REMOVAL ACTIVITIES COMPLETED TO DATE

Activities completed during the reporting period centered on determining the completeness of the chemical oxidation process for the mixed waste (Resources Conservation and Recovery Act [RCRA] and Toxic Substance Control Act [TSCA]) soils that have been generated from excavation activities, collecting soil samples as needed to facilitate material disposal or soil treatment effectiveness, and determining the most appropriate disposal management options for the non-soil materials remaining at the RRG/Clayton Site. Additional details of the completed tasks are provided for review in this report.



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A weekly summary of activities appears below:

- During the week of December 25, 2006 (December 25 – December 30, 2006), the primary activities that were completed centered on CRA's attempts to arrange for the off-Site disposal of Site wastes and to arrange for receipt of the analytical results from the samples collected following the chemical oxidation processing of the remaining stockpile soils at the Site. No actual field activities were performed during the week primarily because of the Christmas Holidays. CRA did receive analytical results for the sample collected from the EZ 4 Loading Dock soils on December 20, 2006. However, these results, which were received on December 27, 2006, simply confirmed that the soils were characteristically ignitable. It should also be noted that The Respondents submitted Status Report # 14 to U.S. EPA on December 30, 2006;
- The primary activities completed during the week of January 1, 2007 involved arranging for waste shipment/disposal, as well as data acquisition. On January 1, 2007, The Respondents submitted Status Report # 14 to U.S. EPA and OSC Kevin Turner via electronic mail. Similarly to the previous week, no personnel mobilized to the Site as the lack of soil analysis made it impractical to schedule on Site activities;
- For the week of January 8, 2007, the primary focus of Site-related activities involved trying to determine the eventual disposal facilities for the remaining on Site, non-soil wastes and obtaining the analytical reports from the December 19, 2006 soil sampling event. CRA received copies of the results from four (4) of the eleven samples on January 11, 2007. The results showed that the samples in question, samples 25R2 through 28R2, all had concentrations of volatile organic compounds (VOCs) below the applicable hazardous waste standards. Also, on January 12, 2007, CRA was informed by EQ that, despite evaluating the available analytical results for the eleven samples using two (2) different criteria (TCLP concentrations and applying the "10 x rule" to total analyte concentrations), four samples still could not be approved for waste disposal acceptance. As such, CRA and EQ preliminarily selected January 17, 2007 as the date to re-sample the treated soils;
- The only activities performed at the Site during the week of January 15, 2007 were completed on Wednesday, January 17, 2007. These activities involved the collection of soil samples from the treated Stockpile # 4/4B materials (batches 22 – 32) and the collection of a composite soil sample from the EZ 4 Loading Dock materials in order to facilitate material disposal through the Veolia facility network. CRA received the complete set of analytical results for the December 19, 2006 post-treatment soil samples from EQ on Monday, January 15, 2007. The data confirmed that seven of the eleven samples had elevated concentrations of VOCs, specifically Tetrachloroethene (PCE), which precluded the material from being accepted into the EQ Wayne Disposal facility. CRA also received the analytical results from EQ's evaluation of the samples against the Land Disposal Restriction (LDR) Alternative Soil Treatment Standards. Using the alternative compliance criteria which allows hazardous materials to be accepted for disposal if the concentration(s) of the hazardous constituents are less the ten times the Universal Treatment Standards (UTS) presented in Title 40 of the Code of Federal Regulations (40 CFR), Section 468.48. Using this alternate evaluation criteria, commonly termed the ten times (10 x) rule, it was determined that the samples collected from batches 24, 30, 31 and 32 were still unqualified to be disposed of at the EQ Wayne facility. The primary off Site activity performed during the week centered on CRA's continued attempt to determine the most practical/applicable disposal facilities for the remaining non-soil wastes; and
- From January 22 through 26, 2007, CRA continued its waste disposal scheduling activities. CRA also was provided with the analytical results from the January 17, 2007, post-treatment soil samples by EQ on January 26, 2007. A review of the analytical results showed that the samples all had VOC

concentrations below the applicable hazardous waste standards, and as such, should be approved for disposal at the EQ Wayne facility.

Additional details of the completed activities, including Site maps, are provided in the form of the Weekly Summary Reports that are included as Appendices to this report. Those reports are presented as follows: Appendix A – Weekly Summary of Site Activities for December 25 –29, 2006; Appendix B – Weekly Summary of Site Activities for January 1– 5, 2007; Appendix C – Weekly Summary of Site Activities for January 8 - 12, 2006; Appendix D – Weekly Summary of Site Activities for January 15 – 19, 2007, and Appendix E – Weekly Summary of Site Activities for January 22 – 26, 2007.

1.2 SAMPLING AND ANALYSIS

Severn Trent Laboratories (STL) of St. Louis, Missouri replaced RTI Laboratories of Livonia, Michigan (RTI) as the laboratory of record for the Removal Action under request by the Respondents. This request was approved by OSC Turner on April 20, 2006.

During the reporting period, a 4-aliquot composite sample was collected from each of the batches of treated Stockpile #4/4B soils on January 17, 2007 (batches 22 – 32). These eleven samples were used to create three (3) composite samples which were submitted to the EQ Wayne laboratory for TCLP VOC analysis on January 18, 2007. A soil sample was also collected from the EZ 4 Loading Dock soils on January 17, 2007. This sample was created by combining material from eight discrete locations within the soil mass, and was collected for the purpose of completing the waste profiling process for material acceptance.

A variety of analytical results were received during the reporting period. On December 27, 2006, CRA received the analytical results of a confirmatory sample that was collected from the EZ 4 Loading Dock materials on December 20, 2006. The sample was submitted to TEK-Lab, Inc. of Collinsville, Illinois for ignitability analysis, and the sample result confirmed that the soils in the loading dock were characteristically hazardous for ignitability. A copy of that analytical report is included as Appendix F of this report. CRA received a partial report of the analytical results for the December 19, 2006, soil samples from EQ on January 11, 2006, and then received the complete report on January 15, 2007. A copy of the comprehensive data package is presented in Appendix G. As stated previously, EQ reanalyzed the soil samples from the December 19, 2006, sample event in an attempt to determine if the material was acceptable under the alternate criteria presented in the LDR regulations of 40 CFR 468. EQ retested the samples for the presence of total VOCs and polychlorinated biphenyls (PCBs). Using the generated data, in conjunction with the previously generated Toxicity Characteristic Leaching Procedure (TCLP) sample results, it was determined that the soils from seven of the eleven remaining batches of treated soils could be disposed of at the EQ Wayne facility with additional treatment. Copies of these analytical results are provided as Appendix H for review. EQ also provided CRA with the analytical results from the January 17, 2007, post-treatment soil samples on January 26, 2007. These results are included as Appendix I of this report.

1.3 REMOVAL ACTION WORK

Several actions have been undertaken towards completing the Removal Action at the RRG/Clayton Chemical Site during the reporting period. An outline of the completed actions was discussed above in

Section 1.1 of this report. Additional details of the activities performed are presented in the Weekly Activity Summaries included as Appendices A through E of this report.

2.0 ENCOUNTERED PROBLEMS, RESOLUTIONS, AND ANTICIPATED PROBLEMS

No significant technical problems were encountered during the reporting period. With the exception of weather-related delays, no additional problems or issues are anticipated for the upcoming period.

3.0 ANALYTICAL DATA GENERATED/RECEIVED

As described in Section 1.2, several samples were collected during the reporting period. Copies of the analytical results for these samples are included for review. The results from the sample submitted to TEK-Lab is enclosed as Appendix F, while the analytical reports for the samples submitted to EQ Wayne laboratory are provided as Appendices G, H and I.

4.0 ANTICIPATED ACTIVITIES FOR UPCOMING REPORT PERIOD

4.1 SITE PLANS

During the upcoming reporting period (January 29, 2007, through February 23, 2007), the following activities are anticipated:

- The shipment and disposal of the remaining treated Stockpile # 4/4B soils will be completed;
- The shipment of all other materials (EZ 4 loading dock soils and drummed wastes) for off Site disposal will be completed;
- Miscellaneous Site cleanup activities will be completed, as needed, based on the progress of the remaining removal activities and weather conditions; and
- Site restoration activities, weather permitting, will be initiated.

4.2 SAMPLING AND ANALYSIS

During the upcoming reporting period, additional material characterization samples may be collected to facilitate waste disposal activities. Personnel from EQ will collect or supervise the collection of the samples, which will be submitted to either STL St. Louis or TEK-Lab for analysis. The samples will be analyzed for the presence of various waste characterization parameters. These samples will be collected and analyzed for disposal characterization in accordance with typical industry practices and standards.

4.3 REMOVAL ACTION WORK

Among the activities expected to be performed and/or completed during the upcoming report period are the assembly of hazardous and non-hazardous wastes, soil management activities, waste characterization and disposal activities. An anticipated schedule for these activities appears below.

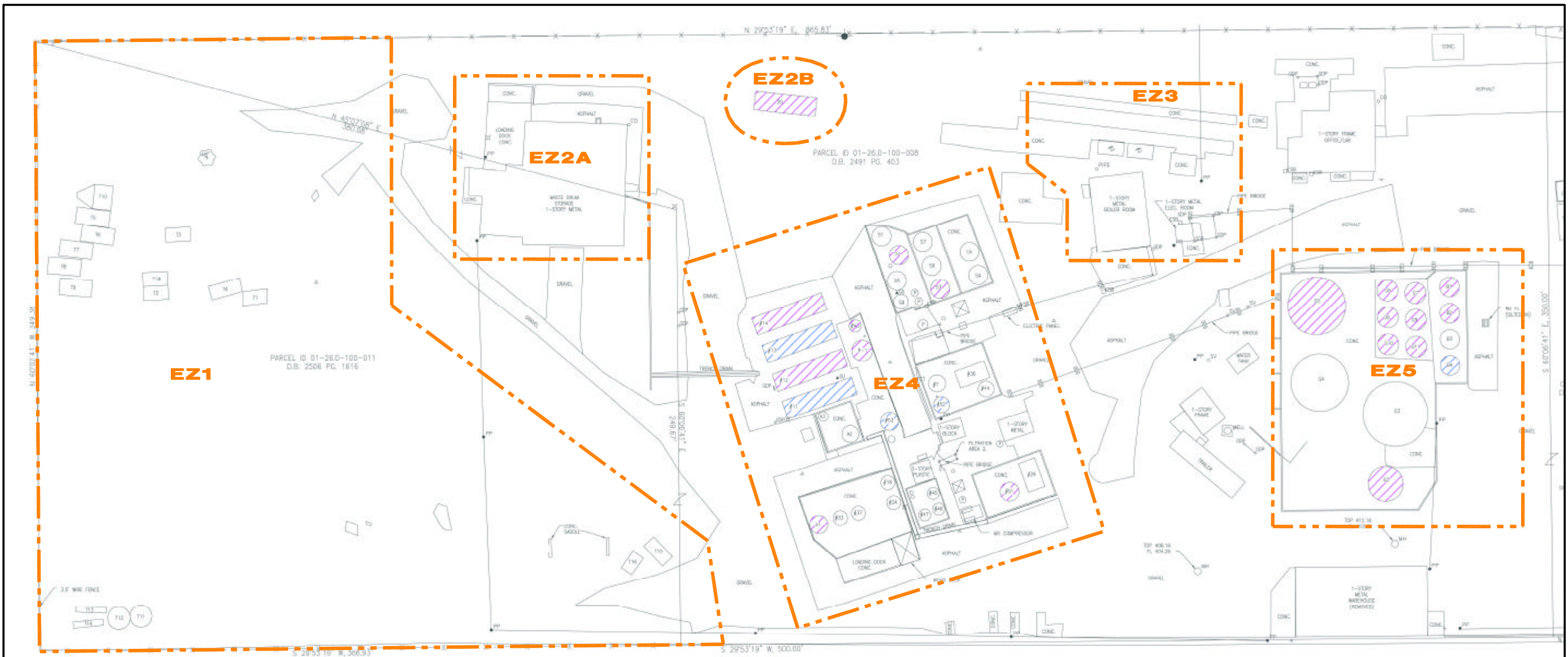
5.0 ANTICIPATED SCHEDULE

<i>Activity</i>	<i>Duration</i>	<i>Expected Start Date</i>
Install Stormwater Control Measures	As needed/ongoing	January 29, 2007
Continue Characterization of Drummed Wastes	Ongoing/30 days	January 29, 2007
Continue Assembly of Site Wastes For Offsite Shipment	Ongoing/30 days	January 29, 2007
Continue Technical Design, and Construction Scheduling of Proposed Landfill Cap	Ongoing/30 days	January 29, 2007
Arrange For Transportation and Disposal of EZ 4 Loading Dock Materials/Wastes	Ongoing/30 days	January 29, 2007
Complete Shipment/Disposal of Treated Soils	1 week	January 29, 2007
Initiate Site Restoration Activities	Ongoing/30 days	January 29, 2007
Submit Status Report # 16	1 day	February 28, 2007

Attachments

FIGURE 1

SITE MAP



LEGEND

CABLE SERVICE BOX	POWER POLE
CLEANOUT	GUY WIRE
ELECTRIC SERVICE BOX	PIPE BRIDGE FOUNDATION
FAUCET	SEWER VENT
FIRE HYDRANT	WATER MANHOLE
GAS DRIP	SMALL VAT POTS IN PROCESS AREA (<5'X5')
GAS VALVE	TANKS WITH "WEEPING"
GUIDEPOST	TANKS WITH SOLIDS REMAINING
LIGHT STANDARD	
MAILBOX	
SIGN	
MANHOLE	
OLD IRON PIPE	

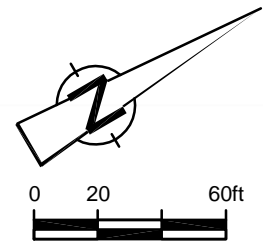


figure 1
 SITE WORKZONE LAYOUT MAP
 RRG CLAYTON CHEMICAL
 Sauget, Illinois



APPENDIX A

WEEKLY SUMMARY OF SITE ACTIVITIES FOR DECEMBER 25 – 29, 2006



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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/68 DATE: January 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
M. Sivek

RE: **Weekly Summary Of Site Activities For December 25 - 29, 2006**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the fifty-sixth week (the period December 25 through December 29, 2006) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 25, 2006	Mobilization Activities	No activities due to Christmas Holiday
	Project Coordination	No activity due to Christmas Holiday
	Site Preparation	No activity due to Christmas Holiday
	Asbestos Abatement	No activity due to Christmas Holiday. Abatement activities were completed on 12/13/05 and the removed ACM was shipped off site on 02/08/06
	AST Sampling/Cleaning Removal	No activity due to Christmas Holiday
	Drum Characterization/Disposal	No activity due to Christmas Holiday
	Piping Draining/Disconnection	No activity due to Christmas Holiday. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity due to Christmas Holiday. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity due to Christmas Holiday
	Miscellaneous	No activity due to Christmas Holiday

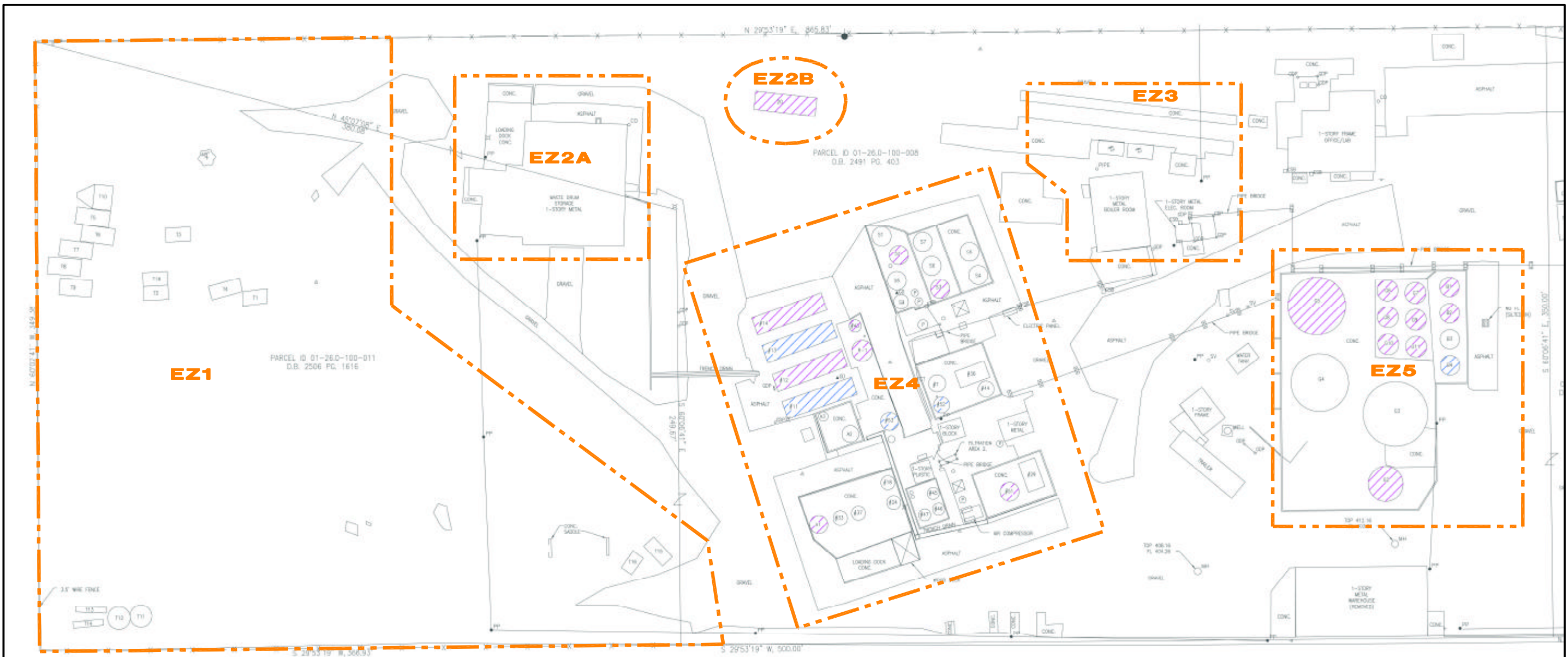
<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 26, 2006	Mobilization Activities	No activity
	Project Coordination	No activity
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity
	Drum Characterization/Disposal	No activity
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity
	Miscellaneous	No activity
Dec. 27, 2006	Mobilization Activities	No on activity due to delay in generation of the analytical results from the December 19, 2006, sampling of the treated soils at the Site
	Project Coordination	No on Site START presence due to no scheduled on Site activity
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Waste Management (WM) regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped offsite
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. CRA continues its attempts to obtain analytical results from EQ for the December 19, 2006, soil sampling event (post-treated chemical oxidation soils)

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 27, 2006	Miscellaneous	CRA receives analytical results from TEK-Lab, Inc. of Collinsville, IL about the ignitability confirmatory sample from the EZ 4 Loading Dock soils. CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
Dec. 28, 2006	Mobilization Activities	No on Site activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. CRA continues its attempts to obtain analytical results from EQ for the December 19, 2006, soil sampling event (post-treated chemical oxidation soils)
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
Dec. 29, 2006	Mobilization Activities	No on Site activities
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
Dec. 29, 2006	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. CRA continues its attempts to obtain analytical results from EQ for the December 19, 2006, soil sampling event (post-treated chemical oxidation soils)
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9933 or 708-203-8672), Marcia Sivek (773-380-9933 or 312-402-1776) or Phil Harvey (773-380-9933) for clarification.

Attachment



LEGEND

	CABLE SERVICE BOX		POWER POLE
	CLEANOUT		GUY WIRE
	ELECTRIC SERVICE BOX		PIPE BRIDGE FOUNDATION
	FAUCET		SEWER VENT
	FIRE HYDRANT		WATER MANHOLE
	GAS DRIP		SMALL VAT POTS IN PROCESS AREA (<5'x5')
	GAS VALVE		TANKS WITH "WEEPING"
	GUIDEPOST		TANKS WITH SOLIDS REMAINING
	LIGHT STANDARD		
	MAILBOX		
	SIGN		
	MANHOLE		
	OLD IRON PIPE		

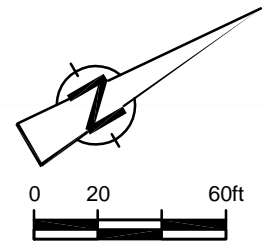


figure 1
 SITE WORKZONE LAYOUT MAP
 RRG CLAYTON CHEMICAL
 Sauget, Illinois



APPENDIX B

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JANUARY 1 - 5, 2007



**CONESTOGA-ROVERS
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MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/69 DATE: January 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
M. Sivek

RE: **Weekly Summary Of Site Activities For January 1 - 5, 2007**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the fifty-seventh week (the period January 1 through January 5, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 1, 2007	Mobilization Activities	No activity due to New Year's Day Holiday
	Project Coordination	No on Site START presence due to New Year's Day Holiday. The Respondents submitted Status Report #14 to U.S. EPA via electronic mail
	Site Preparation	No activity due
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity due to New Year's Day Holiday
	Drum Characterization/Disposal	No activity due to New Year's Day Holiday
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity due to New Year's Day Holiday
	Miscellaneous	No activity due to New Year's Day Holiday
	Mobilization Activities	No on Site activity

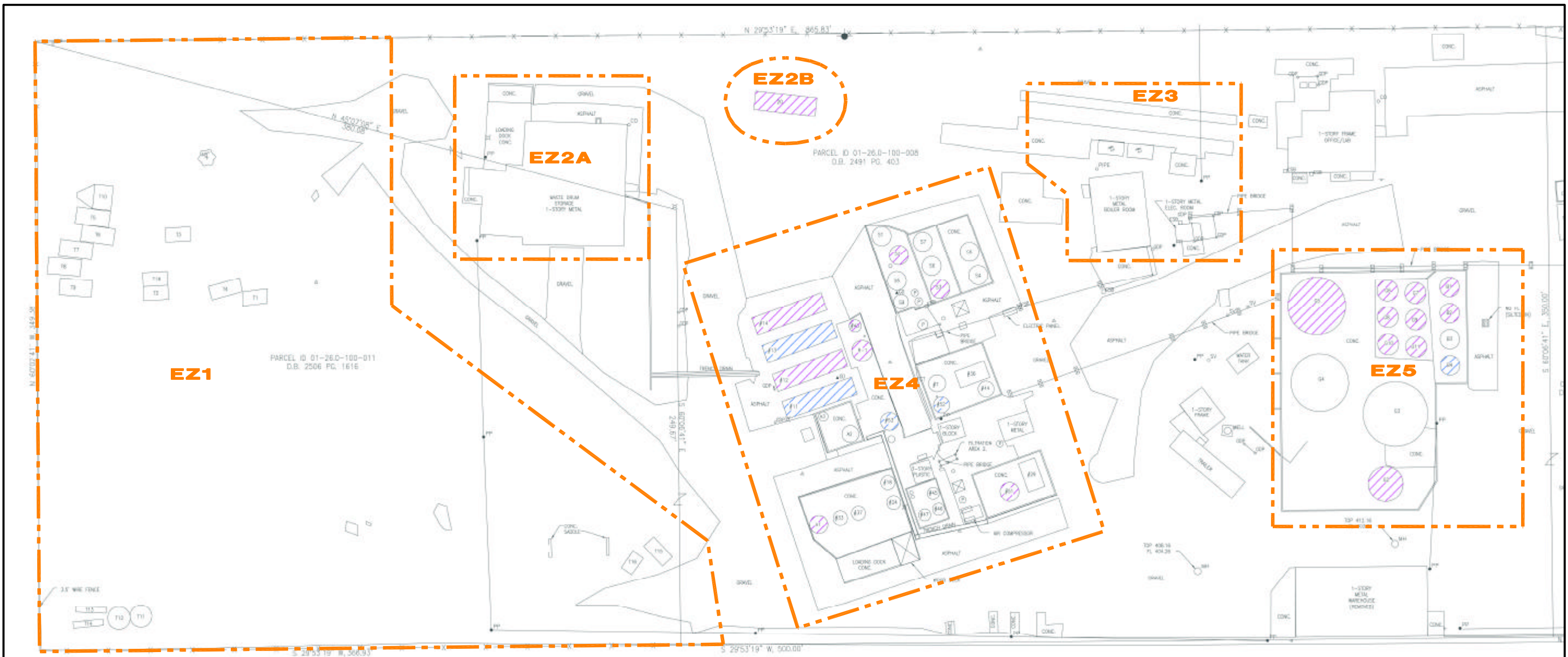
<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 2, 2007	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Waste Management (WM) regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No on Site activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. CRA continues its attempts to obtain analytical results from EQ for the December 19, 2006, soil sampling event (post-treated chemical oxidation soils)
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 3, 2007	Mobilization Activities	No on Site activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No activity
	Drum Characterization/Disposal	No activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped offsite
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. CRA continues its attempts to obtain analytical results from EQ for the December 19, 2006, soil sampling event (post-treated chemical oxidation soils)

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 3, 2007	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 4, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA contacted Veolia about the disposal of 2 drums of waste material from the former tank 3 and submitted available analytical data for review
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. CRA continues its attempts to obtain analytical results from EQ for the December 19, 2006, soil sampling event (post-treated chemical oxidation soils)
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 5, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 5, 2007	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. CRA continues its attempts to obtain analytical results from EQ for the December 19, 2006, soil sampling event (post-treated chemical oxidation soils)
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9933 or 708-203-8672), Marcia Sivek (773-380-9933 or 312-402-1776) or Phil Harvey (773-380-9933) for clarification.

Attachment



LEGEND

CSB	CABLE SERVICE BOX	PP	POWER POLE
CO	CLEANOUT	+	GUY WIRE
ESB	ELECTRIC SERVICE BOX	EB	PIPE BRIDGE FOUNDATION
FC	FAUCET	SV	SEWER VENT
+	FIRE HYDRANT	WM	WATER MANHOLE
GD	GAS DRIP	VP	SMALL VAT POTS IN PROCESS AREA (<5'X5')
GV	GAS VALVE	TW	TANKS WITH "WEeping"
GP	GUIDEPOST	TS	TANKS WITH SOLIDS REMAINING
LS	LIGHT STANDARD		
M	MAILBOX		
S	SIGN		
MH	MANHOLE		
OP	OLD IRON PIPE		

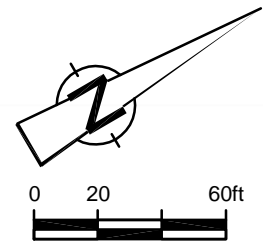


figure 1
SITE WORKZONE LAYOUT MAP
RRG CLAYTON CHEMICAL
Sauget, Illinois



APPENDIX C

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JANUARY 8 - 12, 2007



**CONESTOGA-ROVERS
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FROM: Garth Daley/ko/70 DATE: January 31, 2007

C.C.: Sharon Newlon
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M. Sivek

RE: **Weekly Summary Of Site Activities For January 8 - 12, 2007**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the fifty-eighth week (the period January 8 through January 12, 2007) is presented below.

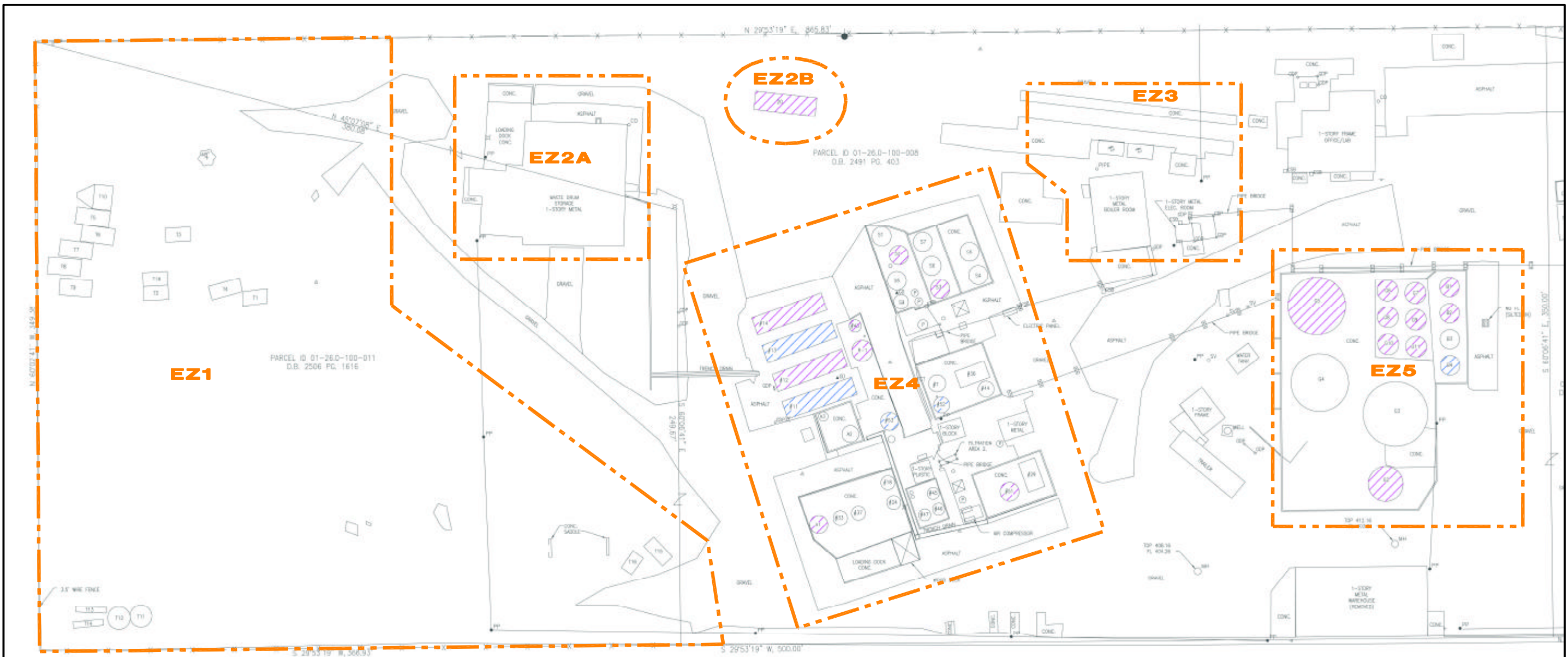
<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 8, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Waste Management (WM) regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 8, 2007	Soil Sampling/Excavation	No on Site activity. CRA continues its attempts to obtain analytical results from EQ for the December 19, 2006, soil sampling event (post-treated chemical oxidation soils)
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 9, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. The Respondents submitted the Drum Building Loading Dock proposal to U.S. EPA/OSC Kevin Turner
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. CRA continues its attempts to obtain analytical results from EQ for the December 19, 2006, soil sampling event (post-treated chemical oxidation soils)
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 10, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 10, 2007	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents. CRA submitted a Waste profile for the tank 3 material to Veolia for review
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility.
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped offsite
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. CRA continues its attempts to obtain analytical results from EQ for the December 19, 2006, soil sampling event (post-treated chemical oxidation soils)
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 11, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 11, 2007	Soil Sampling/Excavation	No on Site activity. CRA continues its attempts to obtain analytical results from EQ for the December 19, 2006, soil sampling event (post-treated chemical oxidation soils). EQ provided CRA with a partial analytical report (batches 25 - 28) from the December 19, 2006, sample event. EQ also informs CRA that the samples were being reanalyzed to determine if the materials could qualify for disposal under Land Disposal Restrictions (LDR) alternate evaluation/acceptance criteria
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 12, 2007	Mobilization Activities	No activity.
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milan landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. CRA was informed by EQ that four (4) of the 11 batches of treated soils were deemed unacceptable for disposal based on the TCLP results and "10 x rule" evaluation, and that those unacceptable batches would need to be re-sampled to determine waste acceptability. The re-sample date chosen was January 17, 2007
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9933 or 708-203-8672), Marcia Sivek (773-380-9933 or 312-402-1776) or Phil Harvey (773-380-9933) for clarification.



LEGEND

CSB	CABLE SERVICE BOX	PP	POWER POLE
CO	CLEANOUT	+	GUY WIRE
ESB	ELECTRIC SERVICE BOX	EB	PIPE BRIDGE FOUNDATION
FC	FAUCET	SV	SEWER VENT
+	FIRE HYDRANT	WM	WATER MANHOLE
GD	GAS DRIP	VP	SMALL VAT POTS IN PROCESS AREA (<5'X5')
GV	GAS VALVE	TW	TANKS WITH "WEeping"
GP	GUIDEPOST	TS	TANKS WITH SOLIDS REMAINING
LS	LIGHT STANDARD		
M	MAILBOX		
S	SIGN		
MH	MANHOLE		
OP	OLD IRON PIPE		

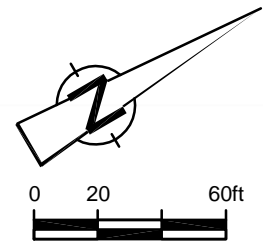


figure 1
SITE WORKZONE LAYOUT MAP
RRG CLAYTON CHEMICAL
Sauget, Illinois



APPENDIX D

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JANUARY 15 - 19, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/71 DATE: January 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
M. Sivek

RE: **Weekly Summary Of Site Activities For January 15 - 19, 2007**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the fifty-ninth week (the period January 15 through January 19, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 15, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Waste Management (WM) regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006

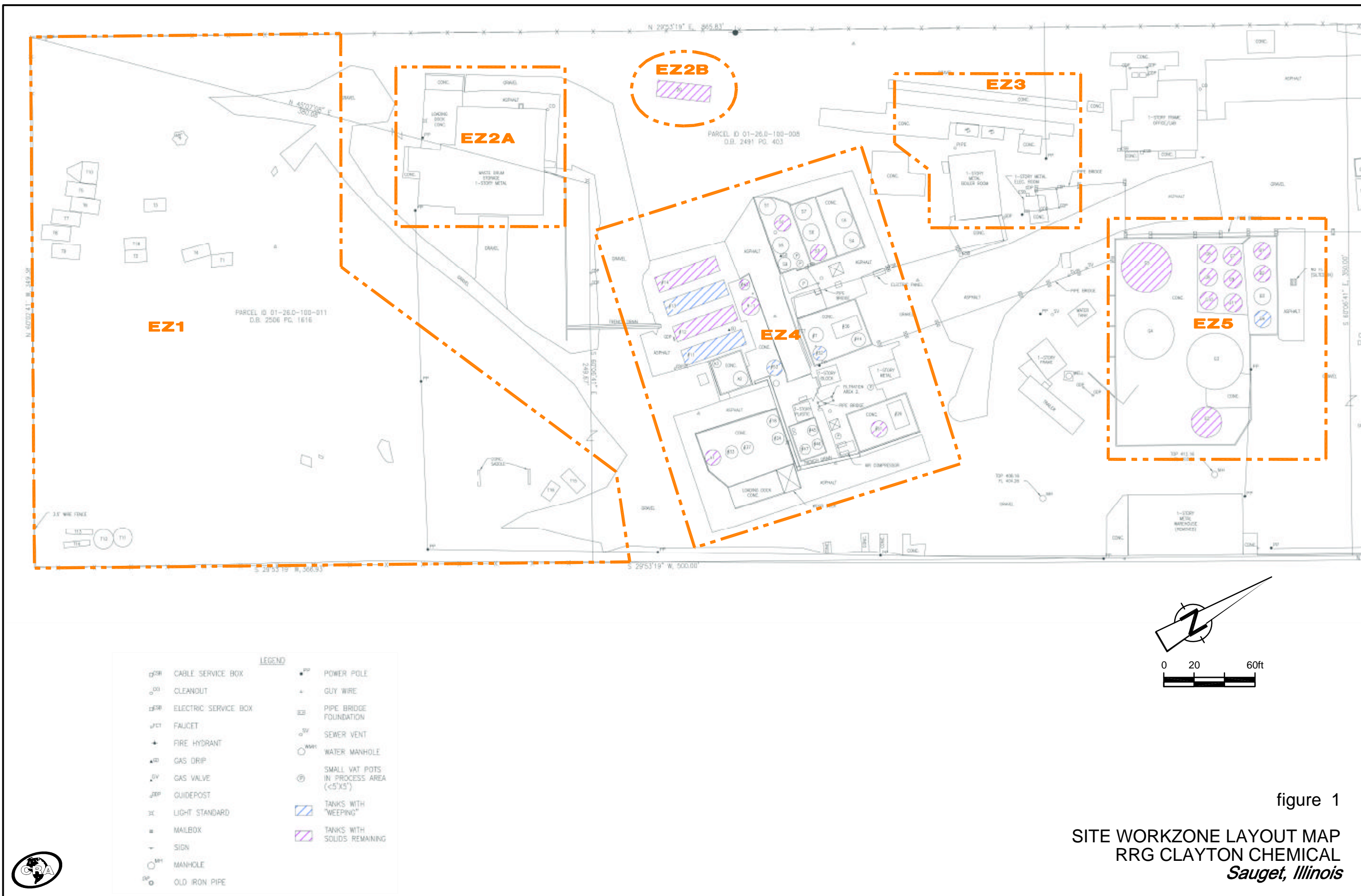
<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 15, 2007	Soil Sampling/Excavation	CRA received the complete analytical results for the December 19, 2006 samples collected by EQ. The final laboratory analytical data for batches 22-32 was sent to CRA via e-mail. Seven of the 11 batch samples had TCLP Tetrachloroethene (PCE) above the hazardous waste standard, and, as such, were unacceptable for disposal at the EQ Wayne facility. EQ subsequently evaluated the soils in accordance with the Land Disposal Restriction (LDR) Alternative Soil Treatment Standards compliance criteria involving the universal treatment standards (UTS), or the "10 x UTS" criteria (10 times rule). CRA was also provided with copies of these analytical results via e-mail. Using the "10 times rule" criteria, EQ determined that samples 24R2, 30R2, 31R2 and 32R2 were still unacceptable for disposal and suggested that those batch soils be re-sampled. CRA and EQ confirmed the re-sample date and discussed the sampling protocol to be followed
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 16, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site activity. CRA contacted START Bob Hill to inform him of sampling activities planned for January 17, 2007
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 16, 2007	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 17, 2007	Mobilization Activities	CRA and Resolution Partners (RP) mobilized on site for soil sampling activities
	Project Coordination	No on Site activity
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped offsite
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	RP collected 4-aliquot composite samples from batches 22 - 32 (Stockpile #4/4B) for a total of 11 composite samples
	Miscellaneous	CRA collected an 8-aliquot composite sample from the EZ 4 Loading Dock soils for waste profiling analysis for disposal at Veolia's Port Arthur, TX facility
January 18, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 18, 2007	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. The 11 soil samples collected on January 17, 2006 were used to create three (3) composite samples (composite sample # 8 from batches 22, 24 and 26, composite sample # 9 from batches 23, 25, 29 and 30, and composite sample # 10 from batches 27, 28, 31 and 32), then shipped to the EQ Wayne laboratory for TCLP analysis
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 19, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9933 or 708-203-8672), Marcia Sivek (773-380-9933 or 312-402-1776) or Phil Harvey (773-380-9933) for clarification.

Attachment



APPENDIX E

WEEKLY SUMMARY OF SITE ACTIVITIES FOR JANUARY 22 - 26, 2007



**CONESTOGA-ROVERS
& ASSOCIATES**

8615 W. Bryn Mawr Avenue, Chicago, Illinois 60631
Telephone: (773) 380-9933 Fax: (773) 380-6421
www.CRAworld.com

MEMORANDUM

TO: RRG/Clayton Chemical Site Technical Committee REF. NO.: 042192-03

FROM: Garth Daley/ko/72 DATE: January 31, 2007

C.C.: Sharon Newlon
P. Harvey
R. Shepherd
B. Schloessler
M. Sivek

RE: **Weekly Summary Of Site Activities For January 22 - 26, 2007**

Site activities began at the Resource Recovery Group/Clayton Chemical Company (RRG/Clayton) Site on Monday, December 5, 2005. These activities are in response to the Solids Removal Action as mandated by the Administrative Settlement Agreement and Order on Consent (AOC) for Removal Action for the RRG/Clayton Chemical Soils Site, dated October 28, 2005. A summary of the activities completed during the sixtieth week (the period January 22 through January 26, 2007) is presented below.

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 22, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with Waste Management (WM) regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity

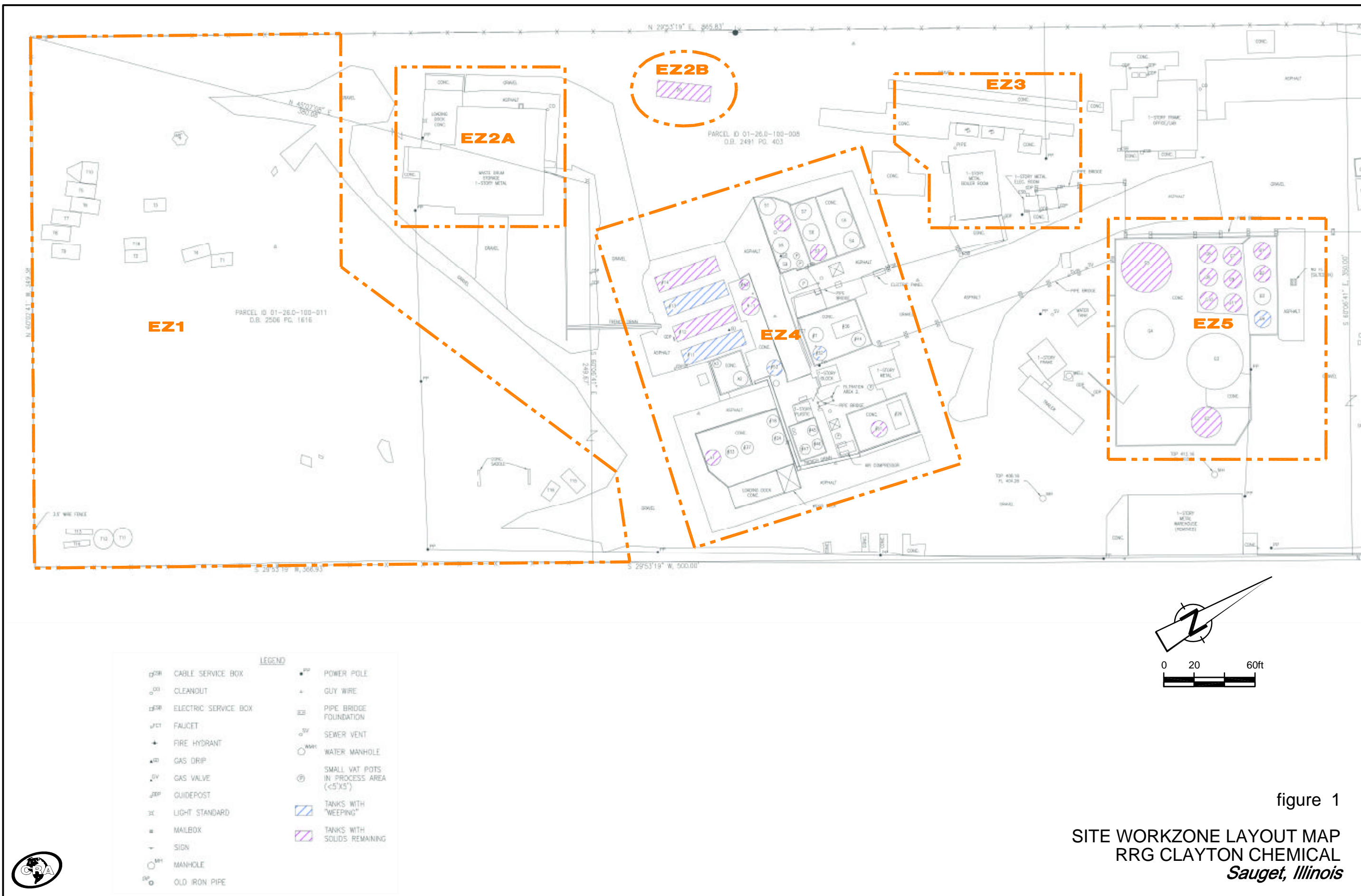
<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 22, 2007	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 23, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site activity. CRA informed START Bob Hill that CRA and Brandenburg Industrial Service Company (BISCo) are tentatively planning to re-mobilize to the Site the week of January 29, 2007
	Site Preparation	No on Site activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 24, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility. WM informs CRA that additional analytical data will be needed for waste approval process to be completed

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 24, 2007	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped offsite
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 25, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities. CRA contacted Tim Fischer, the Remedial Project manager (RPM) for the Sauget Area 2 Site, and requested a copy of the groundwater data from July 2006 sampling event. RPM Fischer said that a CD-ROM containing the data would be sent
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents
	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No activity
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils
January 26, 2007	Mobilization Activities	No activity
	Project Coordination	No on Site START presence due to no scheduled on Site activities
	Site Preparation	No activity
	Asbestos Abatement	No activity. Abatement activities were completed on December 13, 2005 and the removed ACM was shipped off site on February 8, 2006
	AST Sampling/Cleaning Removal	No on Site activity. CRA continues discussion with Veolia regarding the disposal of drums of tank 3 contents

<i>Date</i>	<i>Tasks</i>	<i>Activity</i>
January 26, 2007	Drum Characterization/Disposal	No on Site activity. CRA continues discussion with WM regarding the disposal of drums of non-hazardous materials from the Site at the Milam landfill facility. CRA also contacts Veolia regarding the possible disposal options for the non-hazardous drummed waste at the Site
	Piping Draining/Disconnection	No activity. To date roughly 3,920' of piping have been removed and shipped off site
	Process Equipment Decommissioning	No activity. The removal of process equipment from the Site was completed on March 14, 2006
	Soil Sampling/Excavation	No on Site activity. CRA received the analytical data from the soil samples collected on January 19, 2007. All samples had volatile organic compounds (VOCs) below the hazardous waste standards. EQ is working on disposal approvals with their Wayne facility. EQ is projecting approval by January 31, 2007
	Miscellaneous	CRA continues discussions with Veolia regarding the removal and disposal of the EZ 4 Loading Dock soils

If you have any questions about the information provided in this memorandum, please contact Garth Daley (773-380-9933 or 708-203-8672), Marcia Sivek (773-380-9933 or 312-402-1776) or Phil Harvey (773-380-9933) for clarification.

Attachment



APPENDIX F

ANALYTICAL DATA – EZ 4 LOADING DOCK SOIL (DECEMBER 20, 2006 SAMPLE)

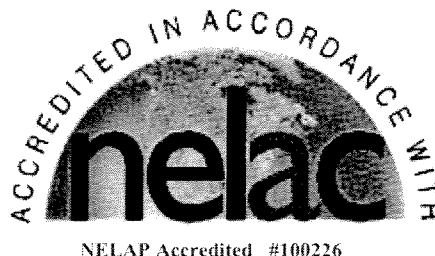
ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

December 27, 2006

Mike Voigt
Brandenburg
2625 S. Loomis St.
Chicago, IL 60608
TEL: (312) 287-8638
FAX: (312) 326-5055



RE: Sauget

OrderNo. 06120603

Dear Mike Voigt:

TEKLAB, INC received 1 sample on 12/20/2006 3:50:00 PM for the analysis presented in the following report. A list of report contents can be found on the following page.

Samples are analyzed on an as received basis unless otherwise requested and documented. The sample results contained in this report relate only to the requested analytes of interest as directed on the chain of custody. IL ELAP and NELAP accredited fields of testing are indicated by the letters NELAP under the Certification column.

All quality control criteria applicable to the test methods employed for this project have been satisfactorily met and are in accordance with NELAP except where noted. The following report shall not be reproduced, except in full, without the written approval of Teklab, Inc.

If you have any questions regarding these tests results, please feel free to call.

Sincerely,

A handwritten signature in black ink that reads 'Heather A. Barnes'.

Heather A. Barnes
Project Manager
(618)344-1004 ex.20

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004
FAX: 618-344-1005

Client: Brandenburg
Project: Sauget
LabOrder: 06120603
Report Date: December 27, 2006

REPORT CONTENTS

This reporting package includes the following:

Analysis Results (this document)	4	pages
Chain of Custody	1	pages
Sample Receipt Checklist	1	pages
Associated Information	NA	pages
Sample Summary	NA	pages
Dates Report	NA	pages
QC Report	NA	pages
Sub Contracted Lab Report	NA	pages
MDL Report	NA	pages

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

Client: Brandenburg
Project: Sauget
LabOrder: 06120603
Report Date: December 27, 2006

CASE NARRATIVE

Cooler Receipt Temp 4.8 °C

Qualifiers

DF - Dilution Factor	B - Analyte detected in the associated Method Blank	E - Value above quantitation range
RL - Reporting Limit	J - Analyte detected below reporting limits	H - Holding time exceeded
ND - Not Detected at the Reporting Limit	R - RPD outside accepted recovery limits	D - Diluted out of sample
Surr - Surrogate Standard added by lab	S - Spike Recovery outside accepted recovery limits	MI - Matrix interference
TNTC - Too numerous to count	X - Value exceeds Maximum Contaminant Level	DNI Did Not Ignite
IDPH - Illinois Department of Public Health	NELAP - IL ELAP and NELAP Accredited Field of Testing	

ENVIRONMENTAL TESTING LABORATORY

TEL: 618-344-1004

FAX: 618-344-1005

Laboratory Results

CLIENT: Brandenburg
WorkOrder: 06120603
Lab ID: 06120603-001
Report Date: 27-Dec-06

Client Project: Sauget
Client Sample ID: S-122016-GD-031
Collection Date: 12/20/2006 2:10:00 PM
Matrix: SOLID

Analyses	Certification	RL	Qual	Result	Units	DF	Date Analyzed	Analyst
ASTM D92 Ignitability, Open Cup		60		<60	°F	1	12/26/2006	AET

Sample Narrative

APPENDIX G

ANALYTICAL DATA – POST-TREATED SOILS (DECEMBER 19, 2006 SAMPLES)

SAMPLE RESULTS REPORT

Report Date : 1/3/2007



Environmental Quality Company

49350 North I-94 Service Drive

Belleville, MI 48111

REPORT TO

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41812
Tracking Number: 214569
Generator: Sauget
Waste Name: 22R2

TCLP ZHE CONSTITUENTS

Analyte Name	Result	Units	MDL	Analysis Date
1,4-DICHLORBENZENE	0.28	mg/L	0.1	12/29/2006
MEK	Less Than	mg/L	0.1	12/29/2006
CHLOROFORM	Less Than	mg/L	0.1	12/29/2006
BENZENE	Less Than	mg/L	0.1	12/29/2006
CARBON TETRACHLORIDE	Less Than	mg/L	0.1	12/29/2006
1,2-DICHLOROETHANE	Less Than	mg/L	0.1	12/29/2006
1,1-DICHLOROETHYLENE	Less Than	mg/L	0.2	12/29/2006
VINYL CHLORIDE	Less Than	mg/L	0.1	12/29/2006
TRICHLOROETHYLENE	0.13	mg/L	0.09	12/29/2006
TETRACHLOROETHYLENE	0.97	mg/L	0.05	12/29/2006
CHLOROBENZENE	0.17	mg/L	0.05	12/29/2006

Total Manganese

Analyte Name	Result	Units	MDL	Analysis Date
Total Manganese	16000	mg/Kg	2.4	01/03/2007

Validated By:

Andrea Schultz

Andrea Schultz

Laboratory Supervisor

PCB CONC. 25 mg/kg

SAMPLE RESULTS REPORT

Report Date : 1/3/2007



Environmental Quality Company

49350 North I-94 Service Drive

Belleville, MI 48111

REPORT TO

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41813
Tracking Number: 214570
Generator: Sauget
Waste Name: 23R2

TCLP ZHE CONSTITUENTS

Analyte Name	Result	Units	MDL	Analysis Date
1,4-DICHLORBENZENE	0.21	mg/L	0.1	12/29/2006
MEK	Less Than	mg/L	0.1	12/29/2006
CHLOROFORM	Less Than	mg/L	0.1	12/29/2006
BENZENE	Less Than	mg/L	0.1	12/29/2006
CARBON TETRACHLORIDE	Less Than	mg/L	0.1	12/29/2006
1,2-DICHLOROETHANE	Less Than	mg/L	0.1	12/29/2006
1,1-DICHLOROETHYLENE	Less Than	mg/L	0.2	12/29/2006
VINYL CHLORIDE	Less Than	mg/L	0.1	12/29/2006
TRICHLOROETHYLENE	0.15	mg/L	0.09	12/29/2006
TETRACHLOROETHYLENE	0.85	mg/L	0.05	12/29/2006
CHLOROBENZENE	0.14	mg/L	0.05	12/29/2006

Total Manganese

Analyte Name	Result	Units	MDL	Analysis Date
Total Manganese	18000	mg/Kg	2.4	01/03/2007

Validated By:

Andrea Schultz
Laboratory Supervisor

SAMPLE RESULTS REPORT

Report Date : 1/4/2007



Environmental Quality Company
49350 North I-94 Service Drive
Belleville, MI 48111

REPORT TO:

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41814
Tracking Number: 214571
Generator: Sauget
Waste Name: 24R2

TCLP ZHE CONSTITUENTS

Analyte Name	Result	Units	MDL	Analyte Date
1,4-DICHLORBENZENE	0.30	mg/L	0.1	12/29/2006
MEK	Less Than	mg/L	0.1	12/29/2006
CHLOROFORM	Less Than	mg/L	0.1	12/29/2006
BENZENE	Less Than	mg/L	0.1	12/29/2006
CARBON TETRACHLORIDE	Less Than	mg/L	0.1	12/29/2006
1,2-DICHLOROETHANE	Less Than	mg/L	0.1	12/29/2006
1,1-DICHLOROETHYLENE	Less Than	mg/L	0.1	12/29/2006
VINYL CHLORIDE	Less Than	mg/L	0.2	12/29/2006
TRICHLOROETHYLENE	Less Than	mg/L	0.1	12/29/2006
TETRACHLOROETHYLENE	0.24	mg/L	0.09	12/29/2006
CHLOROBENZENE	1.2	mg/L	0.05	12/29/2006
	0.25	mg/L	0.05	12/29/2006

Total Manganese

Analyte Name	Result	Units	MDL	Analyte Date
Total Manganese	12000	mg/Kg	2.0	01/04/2007

Validated By:

Andrea Schultz

Andrea Schultz
Laboratory Supervisor

SAMPLE RESULTS REPORT

Report Date : 1/3/2007



Environmental Quality Company

49350 North I-94 Service Drive

Belleville, MI 48111

REPORT TO

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41815

Tracking Number: 214572

Generator: Sauget

Waste Name: 25R2

TCLP ZHE CONSTITUENTS

Analyte Name	Result	Units	MPL	Analysis Date
1,4-DICHLORBENZENE	0.12	mg/L	0.1	01/02/2007
MEK	Less Than	mg/L	0.1	01/02/2007
CHLOROFORM	Less Than	mg/L	0.1	01/02/2007
BENZENE	Less Than	mg/L	0.1	01/02/2007
CARBON TETRACHLORIDE	Less Than	mg/L	0.1	01/02/2007
1,2-DICHLOROETHANE	Less Than	mg/L	0.1	01/02/2007
1,1-DICHLOROETHYLENE	Less Than	mg/L	0.1	01/02/2007
VINYL CHLORIDE	Less Than	mg/L	0.2	01/02/2007
TRICHLOROETHYLENE	Less Than	mg/L	0.1	01/02/2007
TETRACHLOROETHYLENE	Less Than	mg/L	0.09	01/02/2007
CHLOROBENZENE	0.068	mg/L	0.05	01/02/2007
	Less Than	mg/L	0.05	01/02/2007

Total Manganese

Analyte Name	Result	Units	MPL	Analysis Date
Total Manganese	17000	mg/Kg	2.4	01/03/2007

Validated By:

Andrea Schultz

Andrea Schultz
Laboratory Supervisor

ok to ship

SAMPLE RESULTS REPORT

Report Date : 1/3/2007



Environmental Quality Company

49350 North I-94 Service Drive

Belleville, MI 48111

REPORT TO

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41816
Tracking Number: 214573
Generator: Sauget
Waste Name: 26R2

TCLP ZHE CONSTITUENTS

Analyte Name	Result	Units	MDL	Analyze Date
1,4-DICHLORBENZENE	0.21	mg/L	0.1	01/02/2007
MEK	Less Than	mg/L	0.1	01/02/2007
CHLOROFORM	Less Than	mg/L	0.1	01/02/2007
BENZENE	Less Than	mg/L	0.1	01/02/2007
CARBON TETRACHLORIDE	Less Than	mg/L	0.1	01/02/2007
1,2-DICHLOROETHANE	Less Than	mg/L	0.1	01/02/2007
1,1-DICHLOROETHYLENE	Less Than	mg/L	0.1	01/02/2007
VINYL CHLORIDE	Less Than	mg/L	0.2	01/02/2007
TRICHLOROETHYLENE	Less Than	mg/L	0.1	01/02/2007
TETRACHLOROETHYLENE	Less Than	mg/L	0.09	01/02/2007
CHLOROBENZENE	0.25	mg/L	0.05	01/02/2007
	Less Than	mg/L	0.05	01/02/2007

Total Manganese

Analyte Name	Result	Units	MDL	Analyze Date
Total Manganese	16000	mg/Kg	2.4	01/03/2007

Validated By:

Andrea Schultz

Andrea Schultz

Laboratory Supervisor

ok to ship

SAMPLE RESULTS REPORT

Report Date : 1/3/2007



Environmental Quality Company
49350 North I-94 Service Drive
Belleville, MI 48111

REPORT TO

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41817
Tracking Number: 214574
Generator: Sauget
Waste Name: 27R2

TCLP ZHE CONSTITUENTS

Analyte Name	Result	Units	MDL	Analysis Date
1,4-DICHLORBENZENE	0.13	mg/L	0.1	01/02/2007
MEK	Less Than	mg/L	0.1	01/02/2007
CHLOROFORM	Less Than	mg/L	0.1	01/02/2007
BENZENE	Less Than	mg/L	0.1	01/02/2007
CARBON TETRACHLORIDE	Less Than	mg/L	0.1	01/02/2007
1,2-DICHLOROETHANE	Less Than	mg/L	0.1	01/02/2007
1,1-DICHLOROETHYLENE	Less Than	mg/L	0.1	01/02/2007
VINYL CHLORIDE	Less Than	mg/L	0.2	01/02/2007
TRICHLOROETHYLENE	Less Than	mg/L	0.1	01/02/2007
TETRACHLOROETHYLENE	Less Than	mg/L	0.09	01/02/2007
CHLOROBENZENE	0.11	mg/L	0.05	01/02/2007
	Less Than	mg/L	0.05	01/02/2007

Total Manganese

Analyte Name	Result	Units	MDL	Analysis Date
Total Manganese	16000	mg/Kg	2.4	01/03/2007

Validated By:

Andrea Schultz

Andrea Schultz
Laboratory Supervisor

ok to ship

SAMPLE RESULTS REPORT

Report Date : 1/3/2007



Environmental Quality Company

49350 North I-94 Service Drive

Belleville, MI 48111

REPORT TO

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41818

Tracking Number: 214575

Generator: Sauget

Waste Name: 28R2

TCLP ZHE CONSTITUENTS

Analyte Name	Result	Units	MDL	Analysis Date
1,4-DICHLORBENZENE	0.10	mg/L	0.1	01/02/2007
MEK	Less Than	mg/L	0.1	01/02/2007
CHLOROFORM	Less Than	mg/L	0.1	01/02/2007
BENZENE	Less Than	mg/L	0.1	01/02/2007
CARBON TETRACHLORIDE	Less Than	mg/L	0.1	01/02/2007
1,2-DICHLOROETHANE	Less Than	mg/L	0.1	01/02/2007
1,1-DICHLOROETHYLENE	Less Than	mg/L	0.1	01/02/2007
VINYL CHLORIDE	Less Than	mg/L	0.2	01/02/2007
TRICHLOROETHYLENE	Less Than	mg/L	0.1	01/02/2007
TETRACHLOROETHYLENE	Less Than	mg/L	0.09	01/02/2007
CHLOROBENZENE	0.056	mg/L	0.05	01/02/2007
	Less Than	mg/L	0.05	01/02/2007

Total Manganese

Analyte Name	Result	Units	MDL	Analysis Date
Total Manganese	15000	mg/Kg	2.4	01/03/2007

Validated By:

Andrea Schultz

Andrea Schultz
Laboratory Supervisor

ok to ship

SAMPLE RESULTS REPORT

Report Date : 1/4/2007



Environmental Quality Company

49350 North I-94 Service Drive

Belleville, MI 48111



EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41819
Tracking Number: 214576
Generator: Sauget
Waste Name: 29R2

TCLP ZHE CONSTITUENTS

Analyte Name	Result	Units	MDL	Analysis Date
1,4-DICHLORBENZENE	0.51	mg/L	0.10	01/04/2007
MEK	Less Than	mg/L	0.10	01/04/2007
CHLOROFORM	Less Than	mg/L	0.10	01/04/2007
BENZENE	Less Than	mg/L	0.10	01/04/2007
CARBON TETRACHLORIDE	Less Than	mg/L	0.10	01/04/2007
1,2-DICHLOROETHANE	Less Than	mg/L	0.10	01/04/2007
1,1-DICHLOROETHYLENE	Less Than	mg/L	0.20	01/04/2007
VINYL CHLORIDE	Less Than	mg/L	0.10	01/04/2007
TRICHLOROETHYLENE	0.47	mg/L	0.09	01/04/2007
TETRACHLOROETHYLENE	1.9	mg/L	0.05	01/04/2007
CHLOROBENZENE	0.46	mg/L	0.05	01/04/2007

Total Manganese

Analyte Name	Result	Units	MDL	Analysis Date
Total Manganese	21000	mg/Kg	2.4	01/04/2007

Validated By:

Andrea Schultz

Andrea Schultz
Laboratory Supervisor

SAMPLE RESULTS REPORT

Report Date : 1/4/2007



Environmental Quality Company
49350 North I-94 Service Drive
Belleville, MI 48111

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41820
Tracking Number: 214577
Generator: Sauget
Waste Name: 30R2

TCLP ZHE CONSTITUENTS

Analyte Name	Result	Unit	MDL	Analysis Date
1,4-DICHLORBENZENE	0.42	mg/L	0.10	01/04/2007
MEK	Less Than	mg/L	0.10	01/04/2007
CHLOROFORM	Less Than	mg/L	0.10	01/04/2007
BENZENE	Less Than	mg/L	0.10	01/04/2007
CARBON TETRACHLORIDE	Less Than	mg/L	0.10	01/04/2007
1,2-DICHLOROETHANE	Less Than	mg/L	0.10	01/04/2007
1,1-DICHLOROETHYLENE	Less Than	mg/L	0.20	01/04/2007
VINYL CHLORIDE	Less Than	mg/L	0.10	01/04/2007
TRICHLOROETHYLENE	0.33	mg/L	0.09	01/04/2007
TETRACHLOROETHYLENE	1.6	mg/L	0.05	01/04/2007
CHLOROBENZENE	0.35	mg/L	0.05	01/04/2007

Total Manganese

Analyte Name	Result	Unit	MDL	Analysis Date
Total Manganese	18000	mg/Kg	2.0	01/04/2007

Validated By:

Andrea Schultz

Andrea Schultz
Laboratory Supervisor

SAMPLE RESULTS REPORT

Report Date : 1/4/2007



Environmental Quality Company
49350 North I-94 Service Drive
Belleville, MI 48111

RECEIVED TO

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41821
Tracking Number: 214578
Generator: Sauget
Waste Name: 31R2

TCLP ZHE CONSTITUENTS

Analyte Name	Result	Unit	MDL	Analysis Date
1,4-DICHLOROBENZENE	0.35	mg/L	0.10	01/04/2007
MEK	Less Than	mg/L	0.10	01/04/2007
CHLOROFORM	Less Than	mg/L	0.10	01/04/2007
BENZENE	Less Than	mg/L	0.10	01/04/2007
CARBON TETRACHLORIDE	Less Than	mg/L	0.10	01/04/2007
1,2-DICHLOROETHANE	Less Than	mg/L	0.10	01/04/2007
1,1-DICHLOROETHYLENE	Less Than	mg/L	0.10	01/04/2007
VINYL CHLORIDE	Less Than	mg/L	0.20	01/04/2007
TRICHLOROETHYLENE	Less Than	mg/L	0.10	01/04/2007
TETRACHLOROETHYLENE	0.26	mg/L	0.09	01/04/2007
CHLOROBENZENE	1.4	mg/L	0.05	01/04/2007
	0.30	mg/L	0.05	01/04/2007

Total Manganese

Analyte Name	Result	Unit	MDL	Analysis Date
Total Manganese	18000	mg/Kg	2.0	01/04/2007

Validated By:

Andrea Schultz

Andrea Schultz
Laboratory Supervisor

SAMPLE RESULTS REPORT

Report Date : 1/4/2007



Environmental Quality Company
49350 North I-94 Service Drive
Belleville, MI 48111

REPORT TO:

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41822
Tracking Number: 214579
Generator: Sauget
Waste Name: 32R2

TCLP ZHE CONSTITUENTS

Analyte Name	Result	Units	MDE	Analysis Date
1,4-DICHLOROBENZENE	0.44	mg/L	0.10	01/04/2007
MEK	Less Than	mg/L	0.10	01/04/2007
CHLOROFORM	Less Than	mg/L	0.10	01/04/2007
BENZENE	Less Than	mg/L	0.10	01/04/2007
CARBON TETRACHLORIDE	Less Than	mg/L	0.10	01/04/2007
1,2-DICHLOROETHANE	0.18	mg/L	0.10	01/04/2007
1,1-DICHLOROETHYLENE	Less Than	mg/L	0.20	01/04/2007
VINYL CHLORIDE	Less Than	mg/L	0.10	01/04/2007
TRICHLOROETHYLENE	0.64	mg/L	0.09	01/04/2007
TETRACHLOROETHYLENE	2.1	mg/L	0.05	01/04/2007
CHLOROBENZENE	0.53	mg/L	0.05	01/04/2007

Total Manganese

Analyte Name	Result	Units	MDE	Analysis Date
Total Manganese	18000	mg/Kg	2.0	01/04/2007

Validated By:

Andrea Schultz

Andrea Schultz
Laboratory Supervisor

SAUGET

Rev. 3/2003

Chain of Custody

Page _____ of _____

Company Name: *Environmental Solutions*
 Project Contact: *Angela Hassell*
 Telephone: *608-669-1748*
 Project Name: *Sauget*
 Project Number: _____
 Project Location: _____

Sampled By: *Angela Hassell*

Regulatory Program: _____
 UST RCRA SDWA NPDES
 Solid Waste Other _____

Turnaround Time _____
 Normal **RUSH** Date Needed _____
 *Notify Lab prior to sending in RUSH
 Surcharges 24 hr 200% 2-3 days 100% 4-9 days 50%
 Surcharges subject to change without notice.

Landfill License Number

Collection	Field	Field	Grab/	Sample ID	Field
Date	Time	Screen	Comp	Description	Y/N
12/19	9:30		C	22R2	N
12/19	9:40		C	22R2 23R2	N
12/19	9:20		C	24R2	N
12/19	10:00		C	25R2	N
12/19	10:05		C	26R2	N
12/19	10:15		C	27R2	N
12/19	10:30		C	28R2	N
12/19	12:00		C	29R2	N
12/19	12:05		C	30R2	N
12/19	12:40		C	31R2	N
12/19	12:55		C	32R2	N

Relinquished By: _____

Received By: *Angela Hassell*

Date/Time

Date/Time

Relinquished By:

Received by:

CT Laboratories

1230 Lange Court, Baraboo, WI 53913
 608-356-2760 Tel. Fx 608-356-2766
 www.ctlaboratories.com

Ice Present Yes No

Temperature _____

Initials _____

Date _____

Cooler # _____

Place Header Sticker Here:
 Lab Use Only

Mail Report To: *Colleen Lounds*
 Company: *cc: Angela Hassell*
 Address: _____
 City/State/Zip: _____

Invoice To: _____

Company: _____

Address: _____

City/State/Zip: _____

PO No. _____

Contract No. _____

Client Special
 Instructions:

Total No of Containers

Preservation*

Lab ID #

Fill in Spaces with Bottles per Test

S	X	214569	AA41B12	1	A	Shelley 4/4B
S	X	214570	AA41B13	1	A	"
S	X	214571	AA41B14	1	A	"
S	X	214572	AA41B15	1	A	"
S	X	214573	AA41B16	1	A	"
S	X	214574	AA41B17	1	A	"
S	X	214575	AA41B18	1	A	"
S	X	214576	AA41B19	1	A	"
S	X	214577	AA41B20	1	A	"
S	X	214578	AA41B21	1	A	"
S	X	214579	AA41B22	1	A	"

* Preservation Code

A=None B=HCL
 C=H2SO4 D=HNO3
 E=Encore F=Methanol
 G=NaOH
 O=Other

**Matrix

S=Soil A=Air Slg=Sludge M=Misc Waste
 GW=Groundwater SW=Surface Water
 WW=Wastewater DW=Drinking Water

Date/Time

Date/Time

TD/VOCs
 Total Mn

WDNR Well ID #

**Matrix:

APPENDIX H

ANALYTICAL DATA – POST-TREATED SOILS
(DECEMBER 19, 2006 SAMPLES – TOTAL CONCENTRATIONS)

SAMPLE RESULTS REPORT

Report Date : 1/10/2007



Environmental Quality Company

49350 North I-94 Service Drive

Belleville, MI 48111

REPORT TO

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41887

Tracking Number: 214569

Generator: Sauget

Waste Name: 22R2

PCB SCAN

Analyte Name	Result	Units	MDL	Analysis Date
TOTAL PCBs	50	PPM	5	01/09/2007

TOTAL ZHE SCAN

Analyte Name	Result	Units	MDL	Analysis Date
1,4-Dichlorobenzene	29	mg/Kg	6.0	01/09/2007
Methyl ethyl ketone	Less Than	mg/Kg	36	01/09/2007
Chloroform	Less Than	mg/Kg	6.0	01/09/2007
Benzene	Less Than	mg/Kg	10	01/09/2007
Carbon Tetrachloride	Less Than	mg/Kg	6.0	01/09/2007
1,2-Dichloroethane	Less Than	mg/Kg	6.0	01/09/2007
1,1-Dichloroethylene	Less Than	mg/Kg	6.0	01/09/2007
Vinyl Chloride	Less Than	mg/Kg	6.0	01/09/2007
Trichloroethylene	Less Than	mg/Kg	6.0	01/09/2007
Tetrachloroethylene	35	mg/Kg	6.0	01/09/2007
Chlorobenzene	Less Than	mg/Kg	6.0	01/09/2007

Validated By:

Andrea Schultz

Andrea Schultz

Laboratory Supervisor

SAMPLE RESULTS REPORT

Report Date : 1/10/2007



Environmental Quality Company
49350 North I-94 Service Drive
Belleville, MI 48111

REPORT TO

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41888
Tracking Number: 214570
Generator: Sauget
Waste Name: 23R2

PCB SCAN

Analyte Name	Result	Units	MDL	Analysis Date
TOTAL PCBs	34	PPM	5	01/09/2007

TOTAL ZHE SCAN

Analyte Name	Result	Units	MDL	Analysis Date
1,4-Dichlorobenzene	10	mg/Kg	6.0	01/09/2007
Methyl ethyl ketone	Less Than	mg/Kg	36	01/09/2007
Chloroform	Less Than	mg/Kg	6.0	01/09/2007
Benzene	Less Than	mg/Kg	10	01/09/2007
Carbon Tetrachloride	Less Than	mg/Kg	6.0	01/09/2007
1,2-Dichloroethane	Less Than	mg/Kg	6.0	01/09/2007
1,1-Dichloroethylene	Less Than	mg/Kg	6.0	01/09/2007
Vinyl Chloride	Less Than	mg/Kg	6.0	01/09/2007
Trichloroethylene	Less Than	mg/Kg	6.0	01/09/2007
Tetrachloroethylene	13	mg/Kg	6.0	01/09/2007
Chlorobenzene	Less Than	mg/Kg	6.0	01/09/2007

Validated By:

Andrea Schultz

Andrea Schultz
Laboratory Supervisor

SAMPLE RESULTS REPORT



Environmental Quality Company

49350 North I-94 Service Drive

Belleville, MI 48111

Report Date : 1/10/2007

REPORT TO

EQIS - PMG

Transportation & Site Services

2701 N. I-94 Service Drive

Ypsilanti, MI 48198

LOREDO

Sample ID: AA41889

Tracking Number: 214571

Generator: Sauget

Waste Name: 24R2

PCB SCAN

Analyte Name	Result	Units	MDL	Analyte Date
TOTAL PCBs	43	PPM	5	01/09/2007

TOTAL ZHE SCAN

Analyte Name	Result	Units	MDL	Analyte Date
1,4-Dichlorobenzene	29	mg/Kg	6.0	01/10/2007
Methyl ethyl ketone	Less Than	mg/Kg	36	01/10/2007
Chloroform	Less Than	mg/Kg	6.0	01/10/2007
Benzene	Less Than	mg/Kg	10	01/10/2007
Carbon Tetrachloride	Less Than	mg/Kg	6.0	01/10/2007
1,2-Dichloroethane	Less Than	mg/Kg	6.0	01/10/2007
1,1-Dichloroethylene	Less Than	mg/Kg	6.0	01/10/2007
Vinyl Chloride	Less Than	mg/Kg	6.0	01/10/2007
Trichloroethylene	13	mg/Kg	6.0	01/10/2007
Tetrachloroethylene	89	mg/Kg	6.0	01/10/2007
Chlorobenzene	11	mg/Kg	6.0	01/10/2007

Validated By:

Andrea Schultz

Laboratory Supervisor

SAMPLE RESULTS REPORT

Report Date : 1/10/2007



Environmental Quality Company
49350 North I-94 Service Drive
Belleville, MI 48111

REPORT TO

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41890
Tracking Number: 214576
Generator: Sauget
Waste Name: 29R2

PCB SCAN

Analyte Name	Result	Units	MDL	Analysis Date
TOTAL PCBs	Less Than	PPM	5	01/09/2007

TOTAL ZHE SCAN

Analyte Name	Result	Units	MDL	Analysis Date
1,4-Dichlorobenzene	22	mg/Kg	6.0	01/10/2007
Methyl ethyl ketone	Less Than	mg/Kg	36	01/10/2007
Chloroform	Less Than	mg/Kg	6.0	01/10/2007
Benzene	Less Than	mg/Kg	10	01/10/2007
Carbon Tetrachloride	Less Than	mg/Kg	6.0	01/10/2007
1,2-Dichloroethane	Less Than	mg/Kg	6.0	01/10/2007
1,1-Dichloroethylene	Less Than	mg/Kg	6.0	01/10/2007
Vinyl Chloride	Less Than	mg/Kg	6.0	01/10/2007
Trichloroethylene	Less Than	mg/Kg	6.0	01/10/2007
Tetrachloroethylene	27	mg/Kg	6.0	01/10/2007
Chlorobenzene	Less Than	mg/Kg	6.0	01/10/2007

Validated By:

Andrea Schultz

Andrea Schultz
Laboratory Supervisor

SAMPLE RESULTS REPORT

Report Date : 1/10/2007



Environmental Quality Company

49350 North I-94 Service Drive

Belleville, MI 48111

REPORT TO

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41891

Tracking Number: 214577

Generator: Sauget

Waste Name: 30R2

PCB SCAN

Analyte Name

TOTAL PCBs

Result

Less Than

Units

PPM

MDL

5

Analysis Date

01/09/2007

TOTAL ZHE SCAN

Analyte Name

1,4-Dichlorobenzene

Methyl ethyl ketone

Chloroform

Benzene

Carbon Tetrachloride

1,2-Dichloroethane

1,1-Dichloroethylene

Vinyl Chloride

Trichloroethylene

Tetrachloroethylene

Chlorobenzene

Result

49

Less Than

Less Than

Less Than

Less Than

Less Than

Less Than

Less Than

Less Than

15

120

18

Units

mg/Kg

mg/Kg

mg/Kg

mg/Kg

mg/Kg

mg/Kg

mg/Kg

mg/Kg

mg/Kg

mg/Kg

mg/Kg

mg/Kg

MDL

6.0

36

6.0

6.0

10

6.0

6.0

6.0

6.0

6.0

6.0

6.0

Analysis Date

01/10/2007

01/10/2007

01/10/2007

01/10/2007

01/10/2007

01/10/2007

01/10/2007

01/10/2007

01/10/2007

01/10/2007

01/10/2007

01/10/2007

Validated By:

Andrea Schultz

Andrea Schultz

Laboratory Supervisor

SAMPLE RESULTS REPORT

Report Date : 1/10/2007



Environmental Quality Company

49350 North I-94 Service Drive

Belleville, MI 48111

REPORT TO

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198

LOREDO

Sample ID: AA41892

Tracking Number: 214578

Generator: Sauget

Waste Name: 31R2

PCB SCAN

Analyte Name	Result	Units	MDL	Analysis Date
TOTAL PCBs	Less Than	PPM	5	01/09/2007

TOTAL ZHE SCAN

Analyte Name	Result	Units	MDL	Analysis Date
1,4-Dichlorobenzene	42	mg/Kg	6.0	01/10/2007
Methyl ethyl ketone	Less Than	mg/Kg	36	01/10/2007
Chloroform	Less Than	mg/Kg	6.0	01/10/2007
Benzene	Less Than	mg/Kg	10	01/10/2007
Carbon Tetrachloride	Less Than	mg/Kg	6.0	01/10/2007
1,2-Dichloroethane	Less Than	mg/Kg	6.0	01/10/2007
1,1-Dichloroethylene	Less Than	mg/Kg	6.0	01/10/2007
Vinyl Chloride	Less Than	mg/Kg	6.0	01/10/2007
Trichloroethylene	6.3	mg/Kg	6.0	01/10/2007
Tetrachloroethylene	89	mg/Kg	6.0	01/10/2007
Chlorobenzene	8.1	mg/Kg	6.0	01/10/2007

Validated By:

Andrea Schultz

Andrea Schultz
Laboratory Supervisor

SAMPLE RESULTS REPORT

Report Date : 1/10/2007



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REPORT TO

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41893

Tracking Number: 214579

Generator: Sauget

Waste Name: 32R2

PCB SCAN

Analyte Name	Result	Units	MDL	Analysis Date
TOTAL PCBs	Less Than	PPM	5	01/09/2007

TOTAL ZHE SCAN

Analyte Name	Result	Units	MDL	Analysis Date
1,4-Dichlorobenzene	32	mg/Kg	6.0	01/10/2007
Methyl ethyl ketone	Less Than	mg/Kg	36	01/10/2007
Chloroform	Less Than	mg/Kg	6.0	01/10/2007
Benzene	Less Than	mg/Kg	10	01/10/2007
Carbon Tetrachloride	Less Than	mg/Kg	6.0	01/10/2007
1,2-Dichloroethane	Less Than	mg/Kg	6.0	01/10/2007
1,1-Dichloroethylene	Less Than	mg/Kg	6.0	01/10/2007
Vinyl Chloride	Less Than	mg/Kg	6.0	01/10/2007
Trichloroethylene	6.9	mg/Kg	6.0	01/10/2007
Tetrachloroethylene	70	mg/Kg	6.0	01/10/2007
Chlorobenzene	6.7	mg/Kg	6.0	01/10/2007

Validated By:

Andrea Schultz
Laboratory Supervisor

APPENDIX I

ANALYTICAL DATA – POST-TREATED SOILS (JANUARY 17, 2007 SAMPLES)

SAMPLE RESULTS REPORT

Report Date : 1/25/2007



Environmental Quality Company
49350 North I-94 Service Drive
Belleville, MI 48111

REPORT TO

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41990
Tracking Number: 214624 R
Generator: Sauget
Waste Name: COMPOSITE 8

TCLP ZHE CONSTITUENTS

Analyte Name	Result	Units	MDL	Analysis Date
1,4-DICHLORBENZENE	0.24	mg/L	0.10	01/25/2007
MEK	Less Than	mg/L	0.10	01/25/2007
CHLOROFORM	Less Than	mg/L	0.10	01/25/2007
BENZENE	Less Than	mg/L	0.10	01/25/2007
CARBON TETRACHLORIDE	Less Than	mg/L	0.10	01/25/2007
1,2-DICHLOROETHANE	Less Than	mg/L	0.10	01/25/2007
1,1-DICHLOROETHYLENE	Less Than	mg/L	0.20	01/25/2007
VINYL CHLORIDE	Less Than	mg/L	0.10	01/25/2007
TRICHLOROETHYLENE	Less Than	mg/L	0.09	01/25/2007
TETRACHLOROETHYLENE	0.44	mg/L	0.05	01/25/2007
CHLOROBENZENE	0.067	mg/L	0.05	01/25/2007

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Laboratory Supervisor

SAMPLE RESULTS REPORT

Report Date : 1/25/2007



Environmental Quality Company
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Belleville, MI 48111

REPORT TO

EQIS - PMG
Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41991
Tracking Number: 214625 R
Generator: Sauget
Waste Name: COMPOSITE 9

TCLP ZHE CONSTITUENTS

Analyte Name	Result	Units	MDL	Analyte Date
1,4-DICHLORBENZENE	0.16	mg/L	0.10	01/25/2007
MEK	Less Than	mg/L	0.10	01/25/2007
CHLOROFORM	Less Than	mg/L	0.10	01/25/2007
BENZENE	Less Than	mg/L	0.10	01/25/2007
CARBON TETRACHLORIDE	Less Than	mg/L	0.10	01/25/2007
1,2-DICHLOROETHANE	Less Than	mg/L	0.10	01/25/2007
1,1-DICHLOROETHYLENE	Less Than	mg/L	0.20	01/25/2007
VINYL CHLORIDE	Less Than	mg/L	0.10	01/25/2007
TRICHLOROETHYLENE	0.16	mg/L	0.09	01/25/2007
TETRACHLOROETHYLENE	0.29	mg/L	0.05	01/25/2007
CHLOROBENZENE	Less Than	mg/L	0.05	01/25/2007

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Laboratory Supervisor

SAMPLE RESULTS REPORT

Report Date : 1/25/2007



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REPORT TO

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Transportation & Site Services
2701 N. I-94 Service Drive
Ypsilanti, MI 48198
LOREDO

Sample ID: AA41992
Tracking Number: 214626 R
Generator: Sauget
Waste Name: COMPOSITE 10

TCLP ZHE CONSTITUENTS

Analyte Name	Result	Units	MDL	Analysis Date
1,4-DICHLORBENZENE	0.15	mg/L	0.10	01/25/2007
MEK	Less Than	mg/L	0.10	01/25/2007
CHLOROFORM	Less Than	mg/L	0.10	01/25/2007
BENZENE	Less Than	mg/L	0.10	01/25/2007
CARBON TETRACHLORIDE	Less Than	mg/L	0.10	01/25/2007
1,2-DICHLOROETHANE	Less Than	mg/L	0.10	01/25/2007
1,1-DICHLOROETHYLENE	Less Than	mg/L	0.20	01/25/2007
VINYL CHLORIDE	Less Than	mg/L	0.10	01/25/2007
TRICHLOROETHYLENE	Less Than	mg/L	0.09	01/25/2007
TETRACHLOROETHYLENE	0.31	mg/L	0.05	01/25/2007
CHLOROBENZENE	Less Than	mg/L	0.05	01/25/2007

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Laboratory Supervisor